

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DALE PROGRESS, LTD.,

Plaintiff,

v.

CHARLES FUED

D/B/A ROCKVILLE AUDIO,

Defendant.

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CIVIL ACTION NO. _____

PATENT CASE

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AGAINST CHARLES FUED D/B/A ROCKVILLE AUDIO**

Plaintiff Dale Progress Ltd. (“Plaintiff”), by and through its undersigned counsel, files this Complaint against Defendant Charles Fued d/b/a Rockville Audio (“Defendant”) as follows:

NATURE OF THE ACTION

1. This is an action for violation of 35 U.S.C. §§ 271(a) and 35 U.S.C. §§ 271(b). This is a patent infringement action to stop Defendant’s infringement of United States Patent No. 9,686,504 (“the ‘504 patent”) entitled “Remote Resource Access Interface Apparatus” and the United States Patent No. 8,320,461 (“the ‘461 patent”) entitled “Remote Resource Access Interface Apparatus.” A true and correct copy of the ‘504 patent is attached hereto as Exhibit A. A true and correct copy of the ‘461 patent is attached hereto as Exhibit B. Plaintiff is the owner by assignment of the ‘504 and ‘461 patents. Plaintiff seeks monetary damages and injunctive relief.

PARTIES

2. Plaintiff is a limited liability company having a principal place of business located at #204(#-81), 83, Gasan digital 1-ro, Gasan-Dong Geumcheon-gu, Seoul, 08589, Republic of Korea.

3. Upon information and belief, Defendant is Charles Fued d/b/a Rockville Audio and existing under the laws of the State of New York with a principal place of business located at 600 Bayview Ave., Inwood, New York, 11096. Defendant can be served with process by serving Charles Fued, a vice principal of Defendant at 600 Bayview Ave., Inwood, New York 11096.

JURISDICTION AND VENUE

4. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285.

5. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

6. The Court has personal jurisdiction over Defendant because: Defendant is present within or has minimum contacts within the State of New York and the Eastern District of New York; Defendant has purposefully availed himself/itself of the privileges of conducting business in the State of New York and in the Eastern District of New York; Defendant has sought protection and benefit from the laws of the State of New York; Defendant regularly conducts business within the State of New York and within the Eastern District of New York; and Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in the Eastern District of New York. Further, this Court has personal jurisdiction over Defendant because its principal place of business is in New York and has purposely availed itself of the privileges and benefits of the laws of the State of New York.

7. More specifically, Defendant, directly and/or through intermediaries, ships, distributes, uses, offers for sale, sells, and/or advertises products and services in the United States, the State of New York, and the Eastern District of New York including but not limited to the Accused Instrumentalities as detailed below. Upon information and belief, Defendant has committed patent infringement in the State of New York and in the Eastern District of New York. Defendant solicits and has solicited customers in the State of New York and in the Eastern District of New York. Defendant has paying customers who are residents of the State of New York and the Eastern District of New York and who each use and have used the Defendant's products and services in the State of New York and in the Eastern District of New York.

8. Venue is proper in the Eastern District of New York pursuant to 28 U.S.C. §§ 1400(b). On information and belief, Defendant's Principal Place of Business is located in this district, and Defendant has transacted business in this district, and has directly and/or indirectly committed acts of patent infringement in this district.

COUNT I – PATENT INFRINGEMENT

9. Plaintiff refers to and incorporates herein the allegations of Paragraphs 1-8 above.

10. The '504 patent was duly and legally issued by the United States Patent and Trademark Office on June 20, 2017 after full and fair examination. Plaintiff is the owner by assignment of the '504 patent and possesses all rights of recovery under the '504 patent, including the exclusive right to sue for infringement and recover past damages and obtain injunctive relief.

11. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides apparatuses, systems and methods that infringe the '504 patent. Claim 2 of the '504 patent provides, among other things, "a remote resource access interface apparatus comprising: a touch input detection unit configured to detect touch input on a display screen and to generate touch

position information on a display screen; a communication unit configured to receive supportable key information from a compatible portable device, the communication unit is further configured to transmit input key information to the portable device and to receive video information from the portable device; a video output unit configured to display adjusted video information in the form of a visual image, the video output unit having a display screen having a screen specification different from a screen specification of the portable device, wherein the screen specification includes screen resolution information regarding the screen resolutions supported by the portable device; and a key advisor unit configured to output the supportable key information to the video output unit wherein the key advisor unit is configured to receive the touch position information through the touch input detection unit, and wherein the adjusted video information is video data adjusted to screen resolution supported by the video output unit on the basis of the screen resolution information supported by the portable device, and the touch position information is mapped to one of key values indicated by the supportable key information of the portable device such that the touch position information matches key values of the portable device.”

12. Defendant has been and is now infringing the ‘504 Patent in the State of New York, in this judicial district, and elsewhere in the United States, by, among other things, directly or through intermediaries, making, using, importing, testing, providing, supplying, distributing, selling, and/or offering for sale apparatus, methods and systems (including, without limitation, the Defendant’s products including Rockville AN7 2 Din 7" Android Car Receiver which incorporates MirrorLink Functionality identified herein as the “Accused Instrumentalities”) that provide a remote resource access interface device, covered by at least claims 1, 2, 3, 4, 5, 6, 7, 8, and 9 of the ‘504 Patent to the injury of Dale Progress Ltd. Defendant is directly infringing, literally

infringing, and/or infringing the '504 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the '504 Patent pursuant to 35 U.S.C. § 271.

13. Defendant has induced and continues to induce infringement of the '504 Patent by intending that others use, offer for sale, or sell in the United States, products and/or methods covered by one or more claims of the '504 Patent, including, but not limited to, a remote resource access interface apparatus. Defendant provides these products to others, such as customers, resellers and end-use consumers who, in turn, use, offer for sale, or sell in the United States these remote resource access interface apparatus that infringe one or more claims of the '504 Patent.

14. Defendant indirectly infringes the '504 Patent by inducing infringement by others, such as resellers, customers and end-use consumers, in accordance with 35 U.S.C. § 271(b) in this District and elsewhere in the United States. Direct infringement is a result of the activities performed by the resellers, customers and end-use consumers of a remote resource access interface apparatus.

15. Defendant received notice of the '504 Patent at least as of the date this lawsuit was filed.

16. Defendant's affirmative acts of providing and/or selling the remote resource access interface apparatus, including manufacturing and distributing, and providing instructions for using the remote resource access interface apparatus in their normal and customary way to infringe one or more claims of the '504 Patent. Defendant performs the acts that constitute induced infringement, and induce actual infringement, with the knowledge of the '504 Patent and with the knowledge or willful blindness that the induced acts constitute infringement.

17. Defendant specifically intends for others, such as resellers, customers and end-use consumers, to directly infringe one or more claims of the '504 Patent, or, alternatively, has been

willfully blind to the possibility that its inducing acts would cause infringement. By way of example, and not as limitation, Defendant induces such infringement by its affirmative actions by, among other things: (a) providing advertising on the benefits of using the Accused Instrumentalities' functionality; (b) providing information regarding how to use the Accused Instrumentalities' functionality; (c) providing instruction on how to use the Accused Instrumentalities' functionality; and (d) providing hardware and/or software components required to infringe the claims of the '504 Patent.

18. Accordingly, a reasonable inference is that Defendant specifically intends for others, such as resellers, customers and end-use consumers, to directly infringe one or more claims of the '504 Patent in the United States because Defendant has knowledge of the '504 Patent at least as of the date this lawsuit was filed and Defendant actually induces others, such as resellers, customers and end-use consumers, to directly infringe the '504 Patent by using, selling, and/or distributing, within the United States, a remote resource access interface apparatus.

19. As a result of Defendant's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proved at trial.

20. Claim 2 of the '504 patent, claims:

A remote resource access interface apparatus comprising:

Rockville AN7 2 Din 7" Android Car Receiver

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink/Navigation/Bluetooth/Wifi

SmartPhone Mirroring with 2-Way Control

This is my favorite feature. You can mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver. What I love to do is stream Pandora on my phone while using Waze navigation. You can do all of this using the mirroring function and the sound and the screen will go through the receiver!

Source: <https://www.rockvilleaudio.com/an7/>



Source: <https://www.rockvilleaudio.com/an7/>



Source: https://youtu.be/KMxVlrBWe_Y?t=1

Analyst comment- Rockville AN7 2 Din 7" Android Car Receiver works with MirrorLink technique, which demonstrates the remote access i.e. mirroring of portable device (smartphone) with 2 way control. User can mirror their portable device to vehicle dashboard and control it through either phone or vehicle dashboard

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink makes it easy to bring your application to the car dashboard! At CCC we use MirrorLink to bring three different worlds together:

- The Phone – which we refer to as the MirrorLink Server
- The Car Infotainment System – we call this the MirrorLink Client
- The Application – Android apps from developers like you!

Source: <https://MirrorLink.com/Developers>



Source: https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

Analyst comment- For remote resource accessing Rockville AN7 2 Din 7" Android Car Receiver and portable device uses MirrorLink technology. Mirroring only works when both the portable device and vehicle dashboard is MirrorLink certified.

a touch input detection unit configured to detect touch input on a display screen and to generate touch position information on a display screen;

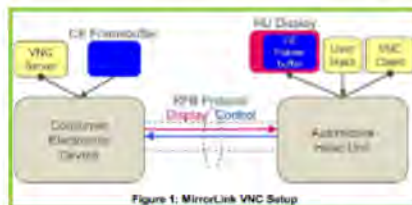
Rockville AN7 2 Din 7" Android Car Receiver



Analyst comment: Rockville AN7 2 Din 7" Android Car Receiver supports MirrorLink technique, which helps to mirror the user portable device on vehicle dashboard and user can control the functionality of portable device using the key inputs and the touch input on the display.

Rockville AN7 2 Din 7" Android Car Receiver

Rockville AN7 2 Din 7" Android Car Receiver
MirrorLink/Navigation/Bluetooth/Wifi



The command and control input is handled as part of the VNC protocol by key and pointer events. A key or pointer event on the MirrorLink Client will be signalled to the MirrorLink Server via a specific key symbol value, which uniquely identifies the event. The mobile device and/or its application will not necessarily support all possible keys defined. Some applications may even have a dynamic behaviour on the selection of key inputs they expect.

Source: https://www.etsi.org/deliver/etsi_ts/103500_103599/10354402/01.03.00_60/ts_10354402v010300p.pdf

Analyst comment- As Rockville AN7 2 Din 7" Android Car Receiver uses MirrorLink technique, so the key and the touch events on the vehicle dash board (Rockville AN7 2 Din 7" Android Car Receiver) indicate the portable device for occurring of key event on the dashboard and process the key event on both the dash board and portable device.

Defendant provides a touch input detection unit configured to detect touch input on a display screen and to generate touch position information on a display screen;

The '504 patent specification clearly states that a touch input detection unit detects a touch input on the display screen and generates position information on the display screen in association of the current image.

The touch input detection unit detects a touch input on the display screen and generates position information on the display screen in association of the current image. The touch input detection unit transmits the position information associated with the current image to the portable device. The touch input detection unit is implemented in the form of a touch-sensitive touchscreen covering the display screen of the video output unit. The touch input detection unit may further include a processor for converting a pressure voltage sensed on the display screen to the position information. *See* '504 patent Col. 4 l. 42-47.

a communication unit configured to receive supportable key information from a compatible portable device, the communication unit further configured to transmit input key information to the portable device and to receive video information from the portable device;

Rockville AN7 2 Din 7" Android Car Receiver

Device Discovery

UPnP

1. Device Discovery

- Based on UPnP (SSDP)
- Smartphone advertises
- Head-Unit searches

2. Device Identification

- Head-Unit reads Phone's Description
- Head-Unit provides Phone its Device Profile
- Contains device and manufacturer details



Source: <https://MirrorLink.com/public/files/files/OpeningSessionBeijingChinaMarch%202015English.pdf>

7" High Resolution Display with Advanced Touch Screen
The AN7 has a 7" high resolution display and the slickest touch screen on the market. It has swipe functions just like an iPhone does. It is the quickest and most reactive on the market thanks to the quad core processor.
You can do all of this using the mirroring function and the sound and the screen will go through the receiver!

Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment- Vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) establishes connection with portable device (smartphone) via USB cable and regularly communicates with each other for the connection to be established or abort. The communication is established only when both the devices are MirrorLink compatible. After the establishment of connection, user can use key input to transfer video information.

Rockville AN7 2 Din 7" Android Car Receiver

HSML is identified as specific encoding within an existing VNC connection. Therefore, remote applications shall be listed and handled as VNC based applications with protocol ID set to "VNC".

During a VNC session the MirrorLink client shall list HSML pseudo encoding (-527) within VNC Set Encoding message, to indicate the support of HSML. If MirrorLink server supports the HSML as well, it shall send VNC Framebuffer Update messages with Context Information (-524) and HSML pseudo encoding (-527) in response to Framebuffer Update Request messages from the MirrorLink client.

| # bytes | Type | Value | Description |
|---------|-------------|--------|---|
| 2 | U16 | 0 | X-position of rectangle (top left corner) |
| 2 | U16 | 0 | Y-position of rectangle (top left corner) |
| 2 | U16 | width | Width of the negotiated framebuffer resolution |
| 2 | U16 | height | Height of the negotiated framebuffer resolution |
| 4 | S32 | -527 | Encoding type |
| 2 | U16 | 16 | The length of unique identifier |
| 16 | Array of UB | | UUID version 4 |

Source: https://www.etsi.org/deliver/etsi_ts/103500_103599/10354421/01_03.00_60/ts_10354421v010300p.pdf

Analyst comment- Evidence demonstrates the MirrorLink features, when both of the devices are compatible with MirrorLink. For establishing connection, a connection establishment message is sent to supportable devices which includes context information and HSML encoding. In response to a request generated by the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver).

Defendant provides a communication unit configured to receive supportable key information from a compatible portable device, the communication unit is further configured to transmit input key information to the portable device and to receive video information from the portable device;

The specification discloses sufficient structure for one of ordinary skill in the art to build or program a communication unit. The specification clearly states that a communication unit utilizes wireless communication interfaces to perform the claim limitation functions.

The communication unit can be provided with at least one wireless communication interfaces specified by Bluetooth, wireless fidelity (wi-fi), ZigBee, wireless broadband (WiBro) protocols for communicating with the portable device. The communication unit can also be connected to the portable device through a communication wire so as to exchange data with the portable device in series or in parallel. *See* '504 patent Col. 4 l. 8-15.

a video output unit configured to display adjusted video information in the form of a visual image, the video output unit having a display screen having a screen specification different from a screen specification of the portable device, wherein the screen specification includes screen resolution information regarding the screen resolutions supported by the portable device; and

Rockville AN7 2 Din 7" Android Car Receiver



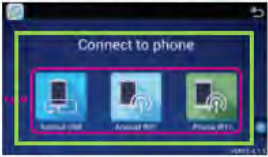
Source: https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver What I love to do is **stream Pandora on my phone while using Waze navigation. You can do all of this using the mirroring function and the sound and the screen will go through the receiver!**

Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment- MirrorLink compatibility allows the user to transfer whatever is displayed on your smartphone to car's built-in infotainment system display. Once connected via USB cable or Bluetooth or Wi-Fi, user can control a variety of apps using either a touchscreen, steering wheel-mounted controls or by voice activation.

Rockville AN7 2 Din 7" Android Car Receiver



Source: <https://www.rockvilleaudio.com/an7/>



Source: https://youtu.be/KMxVlrBWe_Y?t=18



Source: https://youtu.be/KMxVlrBWe_Y?t=1



Source: https://youtu.be/KMxVlrBWe_Y?t=24

Analyst comment- Evidence demonstrates the mirroring process using MirrorLink technique and also demonstrates the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) screen which is larger than the screen of portable device (smartphone).

Rockville AN7 2 Din 7" Android Car Receiver

Source: https://www.etsi.org/deliver/etsi_ts/103500_103599/10354421/01.03.00_60/ts_10354421v010300p.pdf

7" High Resolution Display with Advanced Touch Screen
The AN7 has a 7" high resolution display and the slickest touch screen on the market. It has swipe functions just like an iPhone does. It is the quickest and most reactive on the market thanks to the quad core processor.

Smartphone Mirroring Function with 2 Way Control
iPhone and Android Mirroring Function

Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment- evidence demonstrates the process of updating the resolution information.

Defendant provides a video output unit configured to display adjusted video information in the form of a visual image, the video output unit having a display screen having a screen specification different from a screen specification of the portable device, wherein the screen specification includes screen resolution information regarding the screen resolutions supported by the portable device; and

The video output unit displays the video information output by the pixel information processing unit. The video output unit can be implemented with a liquid crystal display (LCD) panel or an organic light emitting diode (OLED) display panel. *See* '504 patent Col. 3 l. 11-15. The video output unit outputs the video information received from the pixel information processing unit in the form of a visual image. The video output unit can be implemented with a liquid crystal display (LCD) panel or an organic light emitting diode (OLED) panel. Preferably, the video output unit is provided with a display screen larger than that of the portable device. *See* '504 patent Col. 4 l. 29-35.

a key advisor unit configured to extract the supportable key information from the connection establishment response message and output the supportable key information to the video output unit, wherein the key advisor unit displays on a display screen of the video output unit, if a key configuration mode is activated, keys of the portable device and is configured to receive corresponding keys through the key input unit, and wherein key values corresponding to the keys of the key input unit match key values of the portable device.

Rockville AN7 2 Din 7" Android Car Receiver

SmartPhone Mirroring with 2-Way Control

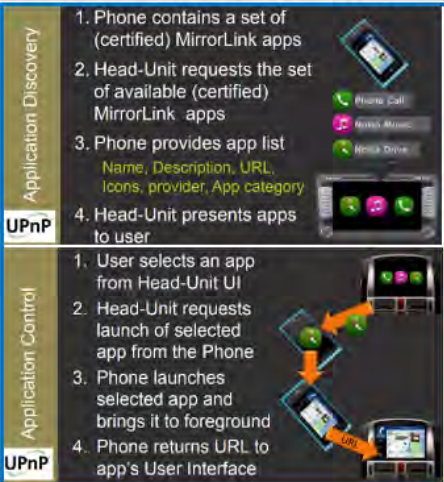
This is my favorite feature. You can mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver. What I love to do is **stream Pandora on my phone while using Waze navigation. You can do all of this using the mirroring function and the sound and the screen will go through the receiver!**



Source: <https://www.rockvilleaudio.com/an7/>

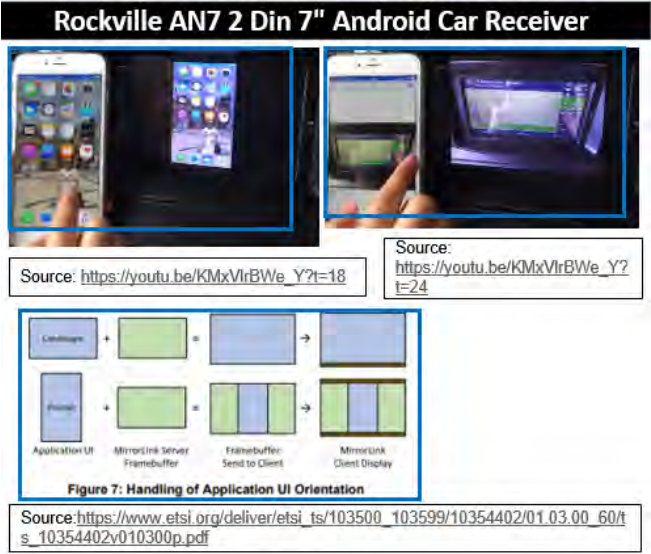
Analyst comment- Evidence demonstrates the smartphone mirroring. The vehicle device is compatible with the MirrorLink technology and receives the sound and the screen control from the portable device (mirroring of portable device function on Rockville AN7 2 Din 7" Android Car Receiver). Controlling is done through specific touch events or key events like increasing volume from the dashboard etc.

Rockville AN7 2 Din 7" Android Car Receiver



Source:
https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

Analyst comment- Evidence demonstrates MirrorLink function in which advisor unit mirrors the consumer electronic display on the vehicle dashboard. The key configuration mode is used to receive the apps like (calling, text, email, navigation etc.) on the display device by requesting via key to a portable device (consumer electronic device).



Analyst comment- Evidence demonstrates the handling of user interface (display screen). The screen information is similar on the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) and the consumer electronic device.

wherein the video information is video data adjusted in resolution by the portable device for the video output unit on the basis of the screen resolution information, and the input key value is mapped to one of key values indicated by the supportable key information of the portable device.

Rockville AN7 2 Din 7" Android Car Receiver

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink/Navigation/Bluetooth/Wifi

Rockville AN7 7" Touchscreen Double DIN Android Receiver with Smartphone Mirroring.

SmartPhone Mirroring with 2-Way Control

This is my favorite feature. You can **mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver**. What I love to do is **stream Pandora on my phone while using Waze navigation**. You can **do all of this using the mirroring function and the sound and the screen will go through the receiver!**



Source:

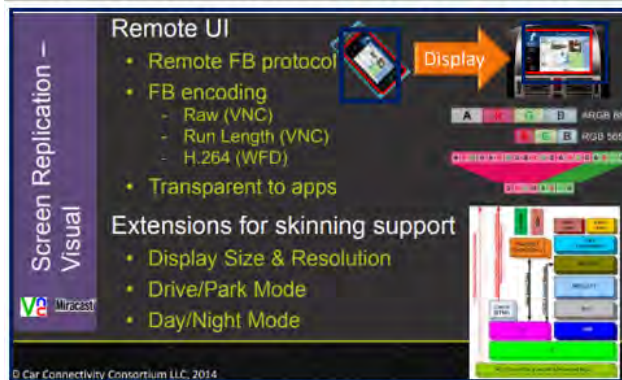
<https://www.rockvilleaudio.com/an7/>

Source:

https://youtu.be/KMxVlrBV/e_Y?t=24

Analyst comment- Evidence demonstrates the adjustment of video resolution information on the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) based on the supported video resolution on the portable device (consumer electronic device).

Rockville AN7 2 Din 7" Android Car Receiver



Source: https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

Analyst comment- Evidence demonstrates the adjustment of video resolution information based on the supported video resolution on the portable device (consumer electronic device).

Defendant provides a key advisor unit configured to output the supportable key information to the video output unit wherein the key advisor unit is configured to receive the touch position information through the touch input detection unit, and wherein the adjusted video information is video data adjusted to screen resolution supported by the video output unit on the basis of the screen resolution information supported by the portable device, and the touch position information is mapped to one of key values indicated by the supportable key information of the portable device such that the touch position information matches key values of the portable device.

The key advisor unit and key input unit are each comprised of software utilizing a microprocessor and storage means on a computer to perform their respective steps as outlined in

the specification. The specification describes an algorithm to transform a general-purpose microprocessor to a special purpose computer so that a person of ordinary skill in the art can implement the disclosed algorithm to achieve the claimed function. A disclosed algorithm can include steps for achieving a result as shown in the '504 patent specification.

In at least one embodiment, the key adviser unit extracts supportable key information from the connection establishment response signal and transmits the supportable key information to the video output unit so as to be displayed on the screen. *See* '504 patent Col. 3 *l.* 16-19. The key input unit is provided with a plurality of keys for generating input key commands. The input key commands are generated by matching the key values input through the key input unit to the key values of the portable device with reference to the supportable key information. *See* '504 patent Col. 3 *l.* 20-25.

In at least one embodiment, the key adviser unit extracts compatible key information from the connection establishment response signal and displays the compatible key information on the display screen of the video output unit. The key adviser unit displays a key among the keys provided by the compatible key information, which is matched to the key input through the key input unit, on the display screen of the video output unit. If a set of keys are selected through the key input unit, the key adviser unit displays the keys supported by the portable device on the display screen of the video output unit. If a key is input through the key input unit, the key adviser unit matches the key value of the input key to a key value of the corresponding key supported by the portable device. *See* '504 patent Col. 4 *l.* 48-62. The key input unit is provided with a plurality of keys for generating input key values. *See* '504 patent Col. 4 *l.* 63-64.

COUNT II – PATENT INFRINGEMENT

21. Plaintiff refers to and incorporates herein the allegations of Paragraphs 1-20 above.

22. The '461 patent was duly and legally issued by the United States Patent and Trademark Office on November 27, 2012 after full and fair examination. Plaintiff is the owner by assignment of the '461 patent and possesses all rights of recovery under the '461 patent, including the exclusive right to sue for infringement and recover past damages and obtain injunctive relief.

23. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides apparatuses and methods that infringe the '461 patent. Claim 9 of the '461 patent provides, among other things, “a remote resource access interface apparatus comprising: a key input unit configured to generate input key values; a communication unit configured to transmit a connection establishment request message to determine compatibility with a portable device and in order to

establish a connection and, if compatible, to receive a connection establishment response message including screen resolution information and supportable key information from the portable device, the communication unit further configured to transmit input key information and to receive video information from the portable device after establishing the connection; a video output unit configured to display the video information in the form of a visual image, the video output unit having a display screen larger than the portable device, wherein the screen resolution information includes information regarding the screen resolutions supported by the video output unit; and a key advisor unit configured to extract the supportable key information from the connection establishment response message and output the supportable key information to the video output unit, wherein the key advisor unit displays on a display screen of the video output unit, if a key configuration mode is activated, keys of the portable device and is configured to receive corresponding keys through the key input unit, and wherein key values corresponding to the keys of the key input unit match key values of the portable device, and wherein the video information is video data adjusted in resolution by the portable device for the video output unit on the basis of the screen resolution information, and the input key value is mapped to one of key values indicated by the supportable key information of the portable device.”

24. Defendant has been and is now infringing the ‘461 Patent in the State of New York, in this judicial district, and elsewhere in the United States, by, among other things, directly or through intermediaries, making, using, importing, testing, providing, supplying, distributing, selling, and/or offering for sale apparatus (including, without limitation, the Defendant’s products including Rockville AN7 2 Din 7” Andriod Car Receiver incorporating MirrorLink functionality, identified herein as the “Accused Instrumentalities”) that provide a remote resource access interface device, covered by at least claims 1, 2, 4, 5, 6, 7, 8, 9 and 10 of the ‘461 Patent to the

injury of Dale Progress Ltd. Defendant is directly infringing, literally infringing, and/or infringing the '461 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the '461 Patent pursuant to 35 U.S.C. § 271.

25. Defendant has induced and continues to induce infringement of the '461 Patent by intending that others use, offer for sale, or sell in the United States, products and/or methods covered by one or more claims of the '461 Patent, including, but not limited to, a remote resource access interface apparatus. Defendant provides these products to others, such as customers, resellers and end-use consumers who, in turn, use, offer for sale, or sell in the United States these a remote resource access interface apparatus that infringe one or more claims of the '461 Patent.

26. Defendant indirectly infringes the '461 Patent by inducing infringement by others, such as resellers, customers and end-use consumers, in accordance with 35 U.S.C. § 271(b) in this District and elsewhere in the United States. Direct infringement is a result of the activities performed by the resellers, customers and end-use consumers of a remote resource access interface apparatus.

27. Defendant received notice of the '461 Patent at least as of the date this lawsuit was filed.

28. Defendant's affirmative acts of providing and/or selling a remote resource access interface apparatus, including manufacturing and distributing, and providing instructions for using the remote resource access interface apparatus in their normal and customary way to infringe one or more claims of the '461 Patent. Defendant performs the acts that constitute induced infringement, and induce actual infringement, with the knowledge of the '461 Patent and with the knowledge or willful blindness that the induced acts constitute infringement.

29. Defendant specifically intends for others, such as resellers, customers and end-use consumers, to directly infringe one or more claims of the '461 Patent, or, alternatively, has been willfully blind to the possibility that its inducing acts would cause infringement. By way of example, and not as limitation, Defendant induces such infringement by its affirmative action by, among other things: (a) providing advertising on the benefits of using the Accused Instrumentalities' functionality; (b) providing information regarding how to use the Accused Instrumentalities' functionality; (c) providing instruction on how to use the Accused Instrumentalities' functionality; and (d) providing hardware and/or software components required to infringe the claims of the '461 Patent.

30. Accordingly, a reasonable inference is that Defendant specifically intends for others, such as resellers, customers and end-use consumers, to directly infringe one or more claims of the '461 Patent in the United States because Defendant has knowledge of the '461 Patent at least as of the date this lawsuit was filed and Defendant actually induces others, such as resellers, customers and end-use consumers, to directly infringe the '461 Patent by using, selling, and/or distributing, within the United States, a remote resource access interface apparatus.

31. As a result of Defendant acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proved at trial.

32. Claim 9 of the '461 patent, claims:

a remote resource access interface apparatus comprising:

Rockville AN7 2 Din 7" Android Car Receiver

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink/Navigation/Bluetooth/Wifi

SmartPhone Mirroring with 2-Way Control

This is my favorite feature. You can mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver. What I love to do is stream Pandora on my phone while using Waze navigation. You can do all of this using the mirroring function and the sound and the screen will go through the receiver!

Source: <https://www.rockvilleaudio.com/an7/>





Source: <https://www.rockvilleaudio.com/an7/>

Source: https://youtu.be/KMxVlrBVVe_Y?t=1


Analyst comment- Rockville AN7 2 Din 7" Android Car Receiver works with MirrorLink technique, which demonstrates the remote access i.e. mirroring of portable device (smartphone) with 2 way control. User can mirror their portable device to vehicle dashboard and control it through either phone or vehicle dashboard

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink makes it easy to bring your application to the car dashboard! At CCC we use MirrorLink to bring three different worlds together:

- The Phone – which we refer to as the MirrorLink Server
- The Car Infotainment System – we call this the MirrorLink Client
- The Application – Android apps from developers like you!

Source: <https://MirrorLink.com/Developers>



Source:https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

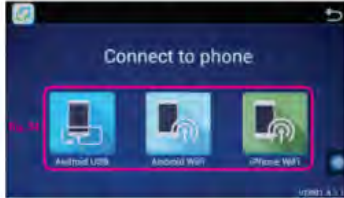
Analyst comment- For remote resource accessing Rockville AN7 2 Din 7" Android Car Receiver and portable device uses MirrorLink technology. Mirroring only works when both the portable device and vehicle dashboard is MirrorLink certified.

a key input unit configured to generate input key values;

Rockville AN7 2 Din 7" Android Car Receiver

Mirroring

To activate mirroring function, press apps icon and find Easy Connected app. On the Connect to Phone screen (fig. 34), select your phone type and desired connection method. Follow on-screen prompts to complete connection process.





Source: https://www.rockvilleaudio.com/content/Manuals/AN7_Manual_v2_HR.pdf

Analyst comment- Rockville AN7 2 Din 7" Android Car Receiver supports MirrorLink technique, which helps to mirror the user portable device on vehicle dashboard and user can control the functionality of portable device using the key inputs and the touch input on the display.

Rockville AN7 2 Din 7" Android Car Receiver

MirrorLink/Navigation/Bluetooth/Wifi



Figure 1: MirrorLink VNC Setup

The command and control input is handled as part of the VNC protocol by key and pointer events. A key or pointer event on the MirrorLink Client will be signalled to the MirrorLink Server via a specific key symbol value, which uniquely identifies the event. The mobile device and/or its application will not necessarily support all possible keys defined. Some applications may even have a dynamic behaviour on the selection of key inputs they expect.

Source: https://www.etsi.org/deliver/etsi_ts/103500_103599/10354402/01_03_00_60/ts_10354402v010300p.pdf

Analyst comment- As Rockville AN7 2 Din 7" Android Car Receiver uses MirrorLink technique, so the key and the touch events on the vehicle dash board (Rockville AN7 2 Din 7" Android Car Receiver) indicate the portable device for occurring of key event on the dashboard and process the key event on both the dash board and portable device.

The key advisor unit and key input unit are each comprised of software utilizing a microprocessor and storage means on a computer to perform their respective steps as outlined in the specification. The specification describes an algorithm to transform a general-purpose microprocessor to a special purpose computer so that a person of ordinary skill in the art can

implement the disclosed algorithm to achieve the claimed function. A disclosed algorithm can include steps for achieving a result as shown in the '461 patent specification.

In at least one embodiment, the key adviser unit extracts supportable key information from the connection establishment response signal and transmits the supportable key information to the video output unit so as to be displayed on the screen. *See* '461 patent Col. 3 *l.* 9-12. The key input unit is provided with a plurality of keys for generating input key commands. The input key commands are generated by matching the key values input through the key input unit to the key values of the portable device with reference to the supportable key information. *See* '461 patent Col. 3 *l.* 13-17.

In at least one embodiment, the key advisor unit extracts compatible key information from the connection establishment response signal and displays the compatible key information on the display screen of the video output unit. The key advisor unit displays a key among the keys provided by the compatible key information, which is matched to the key input through the key input unit, on the display screen of the video output unit. If a set of keys are selected by through the key input unit, the key advisor unit displays the keys supported by the portable device on the display screen of the video output unit. If a key is input through the key input unit, the key advisor unit matches the key value of the input key to a key value of the corresponding key supported by the portable device. *See* '461 patent Col. 4 *l.* 37-46. The key input unit is provided with a plurality of keys for generating input key values. The input key commands are generated by matching the key values input through the key input unit to the key values of the portable device with reference to the supportable key information. *See* '461 patent Col. 3 *l.* 13-17.

a communication unit configured to receive a connection establishment request message from a portable device to determine compatibility with the portable device and in order to establish a connection and, if compatible, to transmit a connection establishment response message including screen resolution information and supportable key information to the portable device, the communication unit further configured to transmit input key information and to receive video information from the portable device after establishing the connection.

Rockville AN7 2 Din 7" Android Car Receiver

Device Discovery

- Based on UPnP (SSDP)
- Smartphone advertises
- Head-Unit searches

Device Identification

- Head-Unit reads Phone's Description
- Head-Unit provides Phone its Device Profile
- Contains device and manufacturer details

Source: https://MirrorLink.com/public/files/Opening_Session_Beijing_China_March_2015_English.pdf

7" High Resolution Display with Advanced Touch Screen
 The AN7 has a 7" high resolution display and the slickest touch screen on the market. It has swipe functions just like an iPhone does. It is the quickest and most reactive on the market thanks to the quad core processor.
 You can do all of this using the mirroring function and the sound and the screen will go through the receiver!

Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment- Vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) establishes connection with portable device (smartphone) via USB cable and regularly communicates with each other for the connection to be established or abort. The communication is established only when both the devices are MirrorLink compatible. After the establishment of connection, user can use key input to transfer video information.

Rockville AN7 2 Din 7" Android Car Receiver

HSML is identified as specific encoding within an existing VNC connection. Therefore, remote applications shall be listed and handled as VNC based applications with protocolID set to "VNC".

During a VNC session the MirrorLink client shall list HSML pseudo encoding (-527) within VNC Set Encoding message, to indicate the support of HSML. If MirrorLink server supports the HSML as well, it shall send VNC Framebuffer Update messages with Context Information (-524) and HSML pseudo encoding (-527) in response to Framebuffer Update Request messages from the MirrorLink client.

| # bytes | Type | Value | Description |
|---------|-------------|--------|---|
| 2 | U16 | 0 | X-position of rectangle (top left corner) |
| 2 | U16 | 0 | Y-position of rectangle (top left corner) |
| 2 | U16 | width | Width of the negotiated framebuffer resolution |
| 2 | U16 | height | Height of the negotiated framebuffer resolution |
| 4 | S32 | -527 | Encoding type |
| 2 | U16 | 16 | The length of unique identifier |
| 16 | Array of U8 | | UUID version 4 |

Source: https://www.etsi.org/deliver/etsi_ts/103500_103599/10354421/01_03.00_60/ts_10354421v010300p.pdf

Analyst comment- Evidence demonstrates the MirrorLink features, when both of the devices are compatible with MirrorLink. For establishing connection, a connection establishment message is sent to supportable devices which includes context information and HSML encoding. In response to a request generated by the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver).

a video output unit configured to display the video information in the form of a visual image, the video output unit having a display screen larger than the portable device, wherein the screen resolution information includes information regarding the screen resolutions supported by the video output unit.

Rockville AN7 2 Din 7" Android Car Receiver



Source: https://MirrorLink.com/public/files/files/Openin_g_Session_Beijing_China_March%202015_English.pdf

mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver What I love to do is stream Pandora on my phone while using Waze navigation. You can do all of this using the mirroring function and the sound and the screen will go through the receiver!


Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment- MirrorLink compatibility allows the user to transfer whatever is displayed on your smartphone to car's built-in infotainment system display. Once connected via USB cable or Bluetooth or Wi-Fi, user can control a variety of apps using either a touchscreen, steering wheel-mounted controls or by voice activation.

Rockville AN7 2 Din 7" Android Car Receiver



Source: <https://www.rockvilleaudio.com/an7/>



Source: https://youtu.be/KMxVlrBWe_Y?t=18



Source: https://youtu.be/KMxVlrBWe_Y?t=1



Source: https://youtu.be/KMxVlrBWe_Y?t=24

Analyst comment- Evidence demonstrates the mirroring process using MirrorLink technique and also demonstrates the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) screen which is larger than the screen of portable device (smartphone).

25

Rockville AN7 2 Din 7" Android Car Receiver

On reception of the ClientDisplayConfiguration message, the VNC Server shall send a FramebufferUpdate message containing a DesktopSize pseudo encoding rectangle with the new framebuffer resolution. In case the VNC Server does not support the new resolution, it shall send a FramebufferUpdate message containing a DesktopSize pseudo encoding rectangle with the old framebuffer resolution, as shown in Figure 14.

Analyst comment: Evidence demonstrates the supported key information message for establishing the connection for displaying video on the vehicle dashboard.

Rockville AN7 2 Din 7" Android Car Receiver

SmartPhone Mirroring with 2-Way Control

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Source: <https://www.rockvilleaudio.com/an7/>

Analyst comment-

Evidence demonstrates the smartphone mirroring. The vehicle device is compatible with the MirrorLink technology and receives the sound and the screen control from the portable device (mirroring of portable device function on Rockville AN7 2 Din 7" Android Car Receiver). Controlling is done through specific touch events or key events like increasing volume from the dashboard etc.

Rockville AN7 2 Din 7" Android Car Receiver

Application Discovery

UPnP

1. Phone contains a set of (certified) MirrorLink apps

2. Head-Unit requests the set of available (certified) MirrorLink apps

3. Phone provides app list
Name, Description, URL, Icons, provider, App category

4. Head-Unit presents apps to user

Application Control

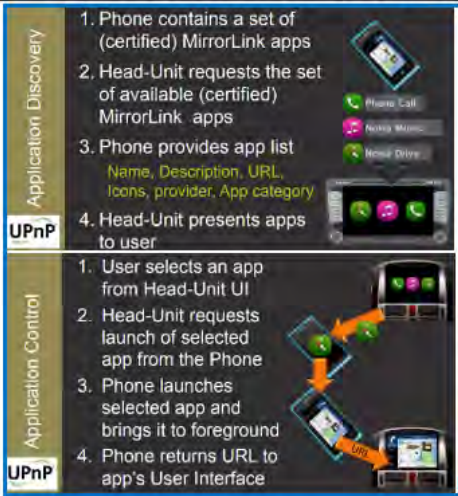
UPnP

1. User selects an app from Head-Unit UI

2. Head-Unit requests launch of selected app from the Phone

3. Phone launches selected app and brings it to foreground

4. Phone returns URL to app's User Interface

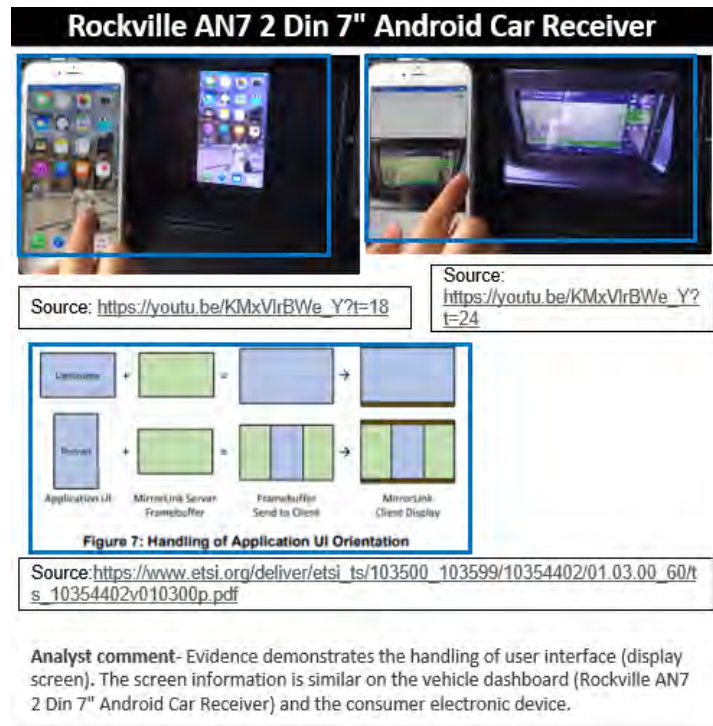


Source: https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

Analyst comment-

Evidence demonstrates MirrorLink function in which advisor unit mirrors the consumer electronic display on the vehicle dashboard. The key configuration mode is used to receive the apps like (calling, text, email, navigation etc.) on the display device by requesting via key to a portable device (consumer electronic device).

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Defendant provides a communication unit configured to transmit a connection establishment request message to determine compatibility with a portable device and in order to establish a connection and, if compatible, to receive a connection establishment response message including screen resolution information and supportable key information from the portable device, the communication unit further configured to transmit input key information and to receive video information from the portable device after establishing the connection.

The specification discloses sufficient structure for one of ordinary skilled in the art to build or program a communication unit. The specification clearly states that a communication unit utilizes wireless communication interfaces to perform the claim limitation functions.

The communication unit can be provided with at least one of wireless communication interfaces specified by Bluetooth, wireless fidelity (wi-fi), ZigBee, wireless broadband (WiBro) protocols for communicating with the portable device. The communication unit also can be connected to the portable device through a communication wire so as to exchange data with the portable device in series or in parallel. *See* '461 patent Col. 3 l. 65-67 & Col. 4 l. 1-5.

Defendant provides a video output unit configured to display the video information in the form of a visual image, the video output unit having a display screen larger than the portable device, wherein the screen resolution information includes information regarding the screen resolutions supported by the video output unit; and

The video output unit displays the video information output by the pixel information processing unit. The video output unit can be implemented with a liquid crystal display (LCD) panel or an organic light emitting diode (OLED) display panel. *See* '461 patent Col. 3 l. 4-8.

The video output unit outputs the video information received from the pixel information processing unit in the form of a visual image. The video output unit can be implemented with a liquid crystal display (LCD) panel or an organic light emitting diode (OLED) panel. Preferably, the video output unit is provided with a display screen larger than that of the portable device. See '461 patent Col. 4 l. 19-25.

wherein the video information is video data adjusted in resolution by the portable device for the video output unit on the basis of the screen resolution information, and the input key value is mapped to one of key values indicated by the supportable key information of the portable device.

Rockville AN7 2 Din 7" Android Car Receiver

Rockville AN7 2 Din 7" Android Car Receiver
MirrorLink/Navigation/Bluetooth/Wifi
 Rockville AN7 7" Touchscreen Double DIN Android Receiver with Smartphone Mirroring.

SmartPhone Mirroring with 2-Way Control
 This is my favorite feature. You can **mirror your iPhone or Android phone to the head unit and control it through the phone or through the touch screen receiver.** What I love to do is **stream Pandora on my phone while using Waze navigation.** You can **do all of this using the mirroring function and the sound and the screen will go through the receiver!**



Source:
<https://www.rockvilleaudio.com/an7/>

Source:
https://youtu.be/KMxVlrBWe_Y?t=24

Analyst comment- Evidence demonstrates the adjustment of video resolution information on the vehicle dashboard (Rockville AN7 2 Din 7" Android Car Receiver) based on the supported video resolution on the portable device (consumer electronic device).

Rockville AN7 2 Din 7" Android Car Receiver

Screen Replication – Visual

Remote UI

- Remote FB protocol
- FB encoding
 - Raw (VNC)
 - Run Length (VNC)
 - H.264 (WFD)
- Transparent to apps

Extensions for skinning support

- Display Size & Resolution
- Drive/Park Mode
- Day/Night Mode

© Car Connectivity Consortium LLC, 2014

Source: https://MirrorLink.com/public/files/files/Opening_Session_Beijing_China_March%202015_English.pdf

Analyst comment- Evidence demonstrates the adjustment of video resolution information based on the supported video resolution on the portable device (consumer electronic device).

Defendant provides a key advisor unit configured to extract the supportable key information from the connection establishment response message and output the supportable key information to the video output unit, wherein the key advisor unit displays on a display screen of the video output unit, if a key configuration mode is activated, keys of the portable device and is configured to receive corresponding keys through the key input unit, and wherein key values corresponding to the keys of the key input unit match key values of the portable device, and wherein the video information is video data adjusted in resolution by the portable device for the video output unit on the basis of the screen resolution information, and the input key value is mapped to one of key values indicated by the supportable key information of the portable device.

The key advisor unit and key input unit are each comprised of software utilizing a microprocessor and storage means on a computer to perform their respective steps as outlined in the specification. The specification describes an algorithm to transform a general-purpose microprocessor to a special purpose computer so that a person of ordinary skill in the art can implement the disclosed algorithm to achieve the claimed function. A disclosed algorithm can include steps for achieving a result as shown in the '461 patent specification.

In at least one embodiment, the key adviser unit extracts supportable key information from the connection establishment response signal and transmits the supportable key information to the video output unit so as to be displayed on the screen. *See* '461 patent Col. 3 l. 9-12. The key input unit is provided with a plurality of keys for generating input key commands. The input key commands are generated by matching the key values input through the key input unit to the key values of the portable device with reference to the supportable key information. *See* '461 patent Col. 3 l. 13-17.

In at least one embodiment, the key advisor unit extracts compatible key information from the connection establishment response signal and displays the compatible key information on the display screen of the video output unit. The key advisor unit displays a key among the keys provided by the compatible key information, which is matched to the key input through the key input unit, on the display screen of the video output unit. If a set of keys are selected by through the key input unit, the key advisor unit displays the keys supported by the portable device on the display screen of the video output unit. If a key is input through the key input unit, the key advisor unit matches the key value of the input key to a key value of the corresponding key supported by the portable device. *See* '461 patent Col. 4 *l.* 37-46. The key input unit is provided with a plurality of keys for generating input key values. The input key commands are generated by matching the key values input through the key input unit to the key values of the portable device with reference to the supportable key information. *See* '461 patent Col. 3 *l.* 13-17.

33. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

34. To the extent 35 U.S.C. § 287 is determined to be applicable, Plaintiff is informed and believes its requirements have been satisfied with respect to the '504 and '461 patents.

35. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court find in its favor and against the Defendant, and that the Court grant Plaintiff the following relief:

- A. A judgment in favor of Plaintiff that Defendant has infringed one or more of the claims, directly, jointly, and/or indirectly the '504 and '461 patents;
- B. A permanent injunction pursuant to 35 U.S.C. § 283, enjoining Defendant and their officers, directors, agents servants, affiliates, employees, divisions, branches,

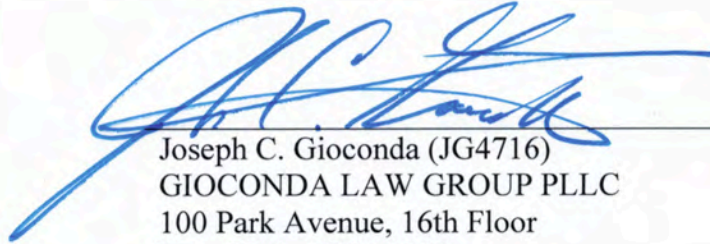
subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the '461 and '504 patents, or such other equitable relief the Court determines is warranted;

- C. An award to Plaintiff of damages adequate to compensate Plaintiff for the Defendant's acts of infringement together with pre-judgment and post-judgment interest; and an accounting of all damages not presented at trial;
- D. That, should Defendant's acts of infringement be found to be willful from the time that Defendant became aware of the infringing nature of their actions, which is the time of filing of Plaintiff's Original Complaint at the latest, that the Court award treble damages for the period of such willful infringement pursuant to 35 U.S.C. § 284; and
- E. Any further relief that this Court deems just and proper.

A TRIAL BY JURY IS DEMANDED.

Dated: May 22, 2019

Respectfully Submitted,



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Dale Progress Ltd.*